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12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 HUGO BARRAGAN,

16 Plaintiff,

17 v.

18 EARLY WARNING SERVICES, LLC; THE  
19 RETAIL EQUATION; and  
BACKGROUNDCHECKS.COM,

20 Defendants.  
21

Case No. 2:20-cv-00795-KJD-VCF

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF TO RESPOND TO  
MOTION TO DISMISS**

**[FIRST REQUEST]**

Complaint filed: May 4, 2020

22 Plaintiff Hugo Barragan ("Plaintiff"), by and through his counsel of record, and Defendant  
23 The Retail Equation ("Retail Equation") have agreed and stipulated to the following:

- 24 1. On May 4, 2020, Plaintiff filed a Complaint [ECF Dkt. 1].  
25 2. On June 15, 2020, Retail Equation filed a Motion to Dismiss the Complaint [ECF  
26 Dkt.13].  
27 3. Plaintiff's Response is due June 29, 2020.  
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1           4.       Plaintiff and Retail Equation have agreed to extend Plaintiff's response fourteen  
2 days in order to allow the Parties to continue working toward an informal resolution, and to extend  
3 Retail Equation's deadline to file a reply in support of its motion for fourteen days for the same  
4 reasons. As a result, both Plaintiff and Retail Equation hereby request this Court to further extend  
5 the date for Plaintiff to respond to Retail Equation's Motion to Dismiss Complaint until **July 13,**  
6 **2020**, and to extend the date for Retail Equation to file their Reply until **July 27, 2020.**  
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5. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

**IT IS SO STIPULATED.**

Dated June 26, 2020

<p><b>KNEPPER &amp; CLARK LLC</b></p> <p><u>/s/ Matthew I. Knepper</u></p> <p>Matthew I. Knepper, Esq., SBN 12796 Miles N. Clark, Esq., SBN 13848 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: Matthew.Knepper@knepperclark.com Email: Miles.Clark@knepperclark.com</p> <p><b>KRIEGER LAW GROUP, LLC</b> David H. Krieger, Esq., SBN 9086 2850 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 Email: DKrieger@kriegerlawgroup.com</p> <p><i>Counsel for Plaintiff</i></p>	<p><b>LEWIS ROCA ROTHGERBER CHRISTIE LLP</b></p> <p><u>/s/ J. Christopher Jorgensen</u></p> <p>J. Christopher Jorgensen, Esq., SBN 5382 Matthew R. Tsai, Esq., SBN 14290 3993 Howard Hughes Pkwy, Suite 600 Las Vegas, NV 89169-5996 Email: CJorgensen@lrrc.com Email: MTsai@lrrc.com</p> <p><b>MAYER BROWN LLP</b> John Nadolenco, Esq. (Pro hac vice application submitted) Email: JNadolenco@mayerbrown.com Daniel D. Queen, Esq. (Pro hac vice application submitted) Email: DQueen@mayerbrown.com 350 South Grand Avenue, 25th Floor Los Angeles, California 90071</p> <p><i>Counsel for Defendant The Retail Equation</i></p>
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**ORDER GRANTING**  
**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO**  
**MOTION TO DISMISS AND FOR DEFENDANT TO FILE REPLY IN SUPPORT OF**  
**MOTION TO DISMISS**

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated: 6/30/20

*Barragan v. Early Warning Services, LLC et al*  
Case No.: 2:20-cv-00795-KJD-VCF